



HERITAGE THERMAL SERVICES  
1250 St. George Street  
East Liverpool, Ohio 43920-3400  
Phone: 330-385-7337  
Fax: 330-385-7813  
www.heritage-thermal.com

OHSAS 18001: 2007  
ISO 14001: 2004  
ISO 9001: 2008

December 18, 2013  
VIA UPS

Mr. George Czerniak, Chief  
U.S. EPA Region V  
Air Enforcement and Compliance Assurance  
Branch  
Mail Code AE-17J  
77 West Jackson  
Chicago, IL 60604

Mr. Erik Bewley  
OEPA-DAPC-NEDO  
Environmental Specialist  
2110 E. Aurora Road  
Twinsburg, OH 44087

RE: HERITAGE THERMAL SERVICES  
EXCESSIVE EXCEEDANCE REPORTING

Dear Mr. Czerniak:

Please find enclosed a written report entitled MACT Excessive Exceedance Report for Heritage Thermal Services. This report is required by 40 CFR 63.1206 (c)(3)(vi) whenever there is more than ten emission standard or operating parameter exceedances that occur within a sixty-day period.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

A handwritten signature in black ink, appearing to read "Stewart Fletcher", is written over a horizontal line.

Stewart Fletcher  
General Manager  
Heritage Thermal Services

cc: Ed Fasco, Ohio EPA-DAPC-NEDO



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# **MACT EXCESSIVE EXCEEDANCE REPORT**

**Heritage Thermal Services**

**December 18, 2013**

## Events

MACT Reporting Query									
#	Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
1	THC	10/24/2013 7:06:03 AM	10/24/2013 8:04:09 AM	Operator Error Feed Prep	Improper feed prep caused combustion upset and THC.	Restarted unit. Reduced charges.	0	58	6
2	SCC Temperature	10/24/2013 8:14:00 AM	10/24/2013 8:20:21 AM	Operator Error Poor Operation	Operator failed to maintain temperature causing WFCO.	Regained temp. Restarted unit.	0	6	21
3	THC	11/15/2013 10:56:56 PM	11/15/2013 11:54:27 PM	Operator Error Feed Prep	Improper feed prep caused combustion upset and THC.	Reduced charge size. Restarted unit.	0	57	31
4	SCC Pressure Using Seals	11/19/2013 1:14:55 AM	11/19/2013 1:15:25 AM	Operator Error Feed Prep	Improper feed prep caused brief pressure spike.	Maintained draft using ID Fan damper.	0	0	30
5	THC	11/22/2013 4:44:46 AM	11/22/2013 5:44:47 AM	Operator Error Feed Prep	Improper feed prep caused combustion upset and THC.	Reduced charge size. Restarted unit.	1	0	1
6	THC	11/26/2013 1:04:08 PM	11/26/2013 2:03:05 PM	Operator Error Feed Prep	Improper feed prep caused combustion upset and THC.	Reduced charge size. Restarted unit.	0	58	57
7	SCC Pressure Using Seals	12/4/2013 2:18:45 PM	12/4/2013 2:19:20 PM	Operator Error Poor Operation	Operator Error caused unit shut down and OPL loss	Restarted unit. Re-trained operator	0	0	35
7	RJ DP	12/4/2013 2:22:59 PM	12/4/2013 3:17:46 PM	Operator Error Poor Operation	Operator Error caused unit shut down and OPL loss	Restarted unit. Re-trained operator	0	54	47
8	THC	12/4/2013 4:09:55 PM	12/4/2013 5:03:57 PM	Operator Error Feed Prep	Improper feed prep caused combustion upset and THC.	Reduced charge size. Restarted unit.	0	54	2
9	RJ Blowdown Flow	12/4/2013 7:42:49 PM	12/4/2013 7:46:53 PM	Operator Error Poor Operation	Poor operation during repairs led to OPL loss	Completed repairs. Restarted unit.	0	4	4
10	THC	12/14/2013 9:07:43 AM	12/14/2013 10:07:07 AM	Operator Error Feed Prep	Improper feed prep caused combustion upset and THC.	Reduced charge size. Restarted unit.	0	59	24

\*\* End of report \*\*

bcc: Env. Dept  
Bob Buchheit  
Kevin Lloyd

file name: environ/MACT/HWC MACT/exceedances/eer13\_1218